

### REQUEST FOR RECONSIDERATION

The Office rejected the present claims as anticipated by the disclosure of a patent to Kim (U.S. 6,091,471). Applicants have extensively argued that Kim does not disclose all of the features of the presently-claimed invention. Applicants draw the Office's attention to the Pre-Appeal Brief filed in the present case on September 16, 2005 for a summary of the arguments pertinent to the novelty of the presently claimed invention in view of Kim. Applicants maintain that the invention of the previously presented claims is patentable over the cited art.

The Office appears to assert that Kim discloses a pretilt angle of substantially 0° and cites to, for example, Figure 14 of Kim for support. Applicants note however that Figures 14d-i show that the pretilt angle of the prior art is subjected to oblique irradiation before fabrication of the prior art device is complete. Applicants submit that Kim's liquid crystal anchoring directions are necessarily disrupted upon exposure to the oblique irradiation (see the photo-irradiating disclosed at column 8, lines 45-47). Thus, even if Kim discloses that an intermediate prepared during the fabrication of the prior art liquid crystal display device has an intermediate wherein the pretilt angles of the liquid crystal anchoring directions are substantially zero, this is not an anticipatory disclosure under the meaning of 35 U.S.C. § 102 because it discloses only an intermediate the prior art liquid crystal display device is completely formed. Thus, Kim does not disclose a prior art liquid display device having liquid crystal in-plane anchoring directions having a pretilt angle that is substantially zero.

The Office also appears to rely on Figure 4 of Kim as proof that the prior art discloses a photo-aligned layer having a pretilt angle of substantially 0°. As was mentioned above with regards to the Office's reliance on Figure 14 as evidence that the presently claimed invention is anticipated, Figure 4 has the same weakness. Namely, Figure 4 may disclose that a photo-

aligned layer formed from a polysiloxane material can have a pretilt angle of substantially 0°; however, as mentioned above the photo-irradiating of the process for fabricating the prior art four-domain liquid crystal cell (i.e., the process described by Figure 14 of Kim) shows that the cell is photo-irradiated (e.g., Fig. 14d-Fig. 14i) and thus no longer maintains a pretilt angle of substantially 0°.

Applicants submit herewith an amended Claim 1 to facilitate allowance of the claims. Independent Claim 1 requires that the electrodes formed on at least one of the substrates is a group of interdigitated electrodes. Kim does not disclose the use of a group of interdigitated electrodes.

Applicants thus submit that amended Claim 1 cannot be anticipated by Kim.

Further, amended Claim 1 requires that the liquid crystal layer between the pair of substrates is a nematic liquid crystal layer. Although Kim discloses various liquid crystal cells at column 8, lines 53-56, Applicants submit that Kim does not disclose the presently claimed liquid crystal display device which includes (1) a nematic liquid crystal layer between a pair of substrates and (2) a group of interdigitated electrodes formed on at least one of the substrates.

Applicants submit that the presently claimed invention is novel and not obvious in view of Kim and respectfully request withdrawal of the rejections.

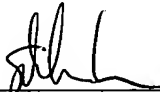
Respectfully submitted,

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